

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Lindsay Light II OU4 - Removal Polrep  
Initial Removal Polrep

US EPA RECORDS CENTER REGION 5



435670



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:**

**POLREP #1**  
**Initial**  
**Lindsay Light II OU4**

**Chicago, IL**  
**Latitude: 41.8890887 Longitude: -87.6136352**

**To:**

Mark Johnson, ATSDR  
Mary Fulghum, U.S. EPA Region V, ORC  
Cathleen Martwick, U.S. EPA Region V, ORC  
Debbie Keating, U.S. EPA Region V, ESS  
Bruce Everetts, Illinois EPA  
Marc Miller, Illinois DNR  
Todd Rettig, Illinois DNR  
John Kim, Illinois EPA  
John Maritote, U.S. EPA  
Carol Ropski, U.S. EPA  
Lindy Nelson, U.S. DOI  
Sam Borries, U.S. EPA  
Yolanda Bouchee-Cureton, U.S. EPA  
Sherry Fielding, U.S. EPA  
Charlie Gebien, U.S. EPA  
John Glover, U.S. EPA  
Thomas Marks, U.S. EPA  
Rahmatunisa Begum, Chicago Dept. of Public Health

Terry Sheahan, Chicago Dept. of Public Health  
Kimberly Worthington, Chicago Dept. of Fleet & Facility Management  
Padmavati Bending, U.S. EPA Region V, ORC  
Isalee Coleman, U.S. EPA Region V  
Peter Cassell, U.S. EPA  
Adnan Khayyat, IEMA  
Mike Joyce, U.S. EPA  
Jason El-Zein, U.S. EPA  
Eugene Jablonowski, U.S. EPA Region V

**From:** Verneta Simon, on-scene coordinator

**Date:** 9/13/2012

**Reporting Period:** 6/4/2012 - 9/13/12

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	05YT	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	6/24/2010
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	
<b>Response Lead:</b>		<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	OU4
<b>Mobilization Date:</b>	6/4/2012	<b>Start Date:</b>	6/15/2011
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	0000002212	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Development of DuSable Park

#### 1.1.2 Site Description

This 3.3 acre peninsula is owned by the Chicago Park District (CPD).

##### 1.1.2.1 Location

401 North Water Street, Chicago, Illinois

##### 1.1.2.2 Description of Threat

In December 2000, U.S. EPA identified radioactive thorium present at this property. U.S. EPA's clean-up criterion is 7.1 picoCuries per gram (pCi/g). Subsequent soil sample results ranged as high as 10,420 pCi/g total radium.

#### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

As a result of the thorium soil concentration sample results and the proximity of the property to Lindsay Light thorium contaminated properties in Streeterville, U.S. EPA designated this property as a Lindsay Light II site. In June 2001, Kerr-McGee Chemical, LLC (K-M), the corporate successor to Lindsay Light Company (Lindsay) performed a limited site investigation which identified five areas of elevated radiation concentrations. Eventually, K-M performed a limited removal at DuSable Park in October 2002. Although K-M removed some thorium contaminated material, additional thorium contaminated material remained.

In June of 2007, a U.S. EPA employee noticed construction activities at DuSable Park. The

Lindsay Team contacted the CPD and Shelbourne Development Group (Shelbourne), the Chicago Calatrava Spire developer, and discovered that Shelbourne had begun using DuSable Park as a construction staging area. Without any notification to U.S. EPA, Shelbourne had conducted grubbing work which included removal of shrubs and grass from the perimeter of DuSable Park and had erected jersey barriers. Later in 2007, Shelbourne conducted intensive work for the construction of the mid-level Lake Shore Drive ramp. While prepping the area for the ramp in October 2007, STS Consultants (now known as AECOM), consultants for Shelbourne, encountered thorium contaminated soils below a concrete slab at an approximate depth of 5 feet. The highest sample result indicated 180 pCi/g total radium. STS remediated an area of approximately 50' x 50'. Tronox manifested and transported off-site a total of six Baker Boxes (80 cubic yards), under a U.S. EPA approved protocol, to the proper disposal facility. U.S. EPA took verification samples that showed a total radium concentraion of 3.5 pCi/g, and, as a result, U.S. EPA released the area for construction. Also in October 2007, STS consultants encountered an area, approximately 10' x 10', of elevated thorium contaminated soils and in March of 2008 encountered an area, approximately 10' x 5', of elevated thorium contaminated soils. Shelbourne did not remediate either of those areas as they did not interfere with Shelbourne's planned construction activities. In 2009, Shelbourne ceased construction of the Spire development due to the national economic downturn and as a result discontinued use of DuSable Park as a construction staging area.

On June 4, 2012, the CPD mobilized to DuSable Park, using Tronox bankruptcy settlement funds that had been placed in a U.S. EPA special account for DuSable Park. U.S. EPA provided the special account funds to CPD pursuant to a Cooperative Agreement, Cooperative Agreement # V-00E0075-0. This Cooperative Agreement requires the CPD to remediate six locations specified in the cooperative agreement workplan.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

In addition to the CPD remediation work, the Chicago Department of Transportation (CDOT) has drilled five preliminary borings for the Navy Pier Flyover Bridge. CDOT radioactively monitored the borings to 12 feet and did not identify any radioactive contamination. CDOT needs to return and drill down approximately 90 feet.

#### 2.1.2 Response Actions to Date

U.S. EPA Superfund Health Physicist Eugene Jablonowski conducted a walkover on July 17, 2012 to confirm that there is no longer surficial contamination, since the Park District conducted limited regrading of the piles. In addition, the Park District plans to bring in topsoil and vegetative cover until final design plans are available for DuSable Park. In the past, the Park District covered the soil piles with tarps in an attempt to prevent soil erosion and dust blowing. The tarps failed to stay in place, which is why the Park District is placing a vegetative cover over the Park area.

#### 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Not Applicable

#### 2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>


## **2.2 Planning Section**

### **2.2.1 Anticipated Activities**

Currently, there are 115 cubic yards of thorium contaminated soil secured and staged under Lake Shore Drive. Off-site disposal is tentatively arranged for September 19 and 20.

#### **2.2.1.1 Planned Response Activities**

After off-site disposal is completed, the Chicago Park District will begin work on the vegetative cover.

#### **2.2.1.2 Next Steps**

Within 30 days after completion of off-site disposal, the Chicago Park District will submit a final report according to the terms of the cooperative agreement.

A different cooperative agreement will be entered into with the City of Chicago to address the Navy Pier Flyover Bridge and the back-up power to the Lake Shore Drive bridge.

### **2.2.2 Issues**

An Environmental Covenant with the Chicago Park District.

## **2.3 Logistics Section**

Not Applicable

## **2.4 Finance Section**

### **2.4.1 Narrative**

U.S. EPA established a special account for DuSable Park that was funded with proceeds from the 2010 Tronox bankruptcy settlement and consent decree. U.S. EPA provided the special account funds to CPD pursuant to a Cooperative Agreement, Cooperative Agreement # V-00E0075-0. The cooperative agreement has been funded by U.S. EPA in the amount of \$250,000.

## **2.5 Other Command Staff**

### **2.5.1 Safety Officer**

The cooperative agreement required a health and safety plan.

### **2.5.2 Liaison Officer**

Not Applicable

### **2.5.3 Information Officer**

Mike Joyce is the Community Involvement Coordinator. The FACT sheet prepared by the Chicago Park District is available in the "Documents" section.

## **3. Participating Entities**

### **3.1 Unified Command**

Not Applicable

**3.2 Cooperating Agencies**

Chicago Park District

City of Chicago Department of Transportation

**4. Personnel On Site**

Not Applicable

**5. Definition of Terms**

OSC - On-Scene Coordinator

U.S. EPA - United States Environmental Protection Agency

CPD - Chicago Park District

CDOT - Chicago Department of Transportation

**6. Additional sources of information**

**6.1 Internet location of additional information/report**

For additional information, please refer to "Documents" on [www.epaosc.org](http://www.epaosc.org) and the website [www.epa.gov/region5/cleanup/lindsaylight](http://www.epa.gov/region5/cleanup/lindsaylight).

**6.2 Reporting Schedule**

**7. Situational Reference Materials**

No information available at this time.